

EXHIBIT A

1 Evan S. Goldstein #011866
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4 Phoenix, Arizona 85022
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6 Facsimile: (602) 569-8201
7 egoldstein@gwalawfirm.com

8 **TUCKER & MILLER, L.L.P.**
9 1440 E. Missouri Avenue, Suite C150
10 Phoenix, AZ 85014
11 Tel: (602) 870-5511
12 Fax: (602) 870-5255
13 E-Mail: Dmiller@tucker-miller.com
14 DANIEL P.J. MILLER – I.D. #009769
15 KEVIN J. TUCKER – I.D. #013437

16 Attorneys for Plaintiff

17 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

18 **IN AND FOR THE COUNTY OF MARICOPA**

19 **ERIC CLIFFORD**, a single man.)

20 Plaintiff,)

21 v.)

22 **The National Association for Stock Car**)
23 **Auto Racing, LLC. d/b/a "NASCAR", a**)
24 **Florida Corporation; Phoenix Speedway,**)
25 **LLC d/b/a Phoenix Raceway and "PIR"**)
26 **and formerly ISM Raceway, an Arizona**)
27 **corporation;**)
28 **NASCAR ENTERPRISES, LLC, an**)
29 **Arizona corporation;**)
30 **JOHN AND JANE DOES I-IV; ABC**)
31 **CORPORATIONS and XYZ Partnerships,**)

32 **Defendants.**

33 NO. CV2022-002269

34 **FIRST AMENDED COMPLAINT**

35 **(TIER 3)**

36 For his First Amended Complaint against Defendants, Plaintiff alleges as follows:

37 **COUNT ONE**
38 **NEGLIGENCE**

- 39 1. Plaintiff is a resident of Yuma County Arizona and the events complained of herein
40 occurred in Maricopa County.

- 1 2. Defendant, The National Association for Stock Car Auto Racing, LLC d/b/a
2 'NASCAR' is a Florida corporation doing business in Arizona by, among other
3 activities owning and/or operating a motor vehicle raceway facility in west Phoenix
4 known as Phoenix International Raceway ("PIR"), Phoenix Raceway, and/or ISM
5 Raceway.
- 6 3. Defendant Phoenix Speedway, LLC is an Arizona corporation doing business in
7 Maricopa County as Phoenix Raceway, "PIR", and/or ISM Raceway and owns,
8 operates and/or manages the aforesaid raceways in West Phoenix.
- 9 4. Defendant, NASCAR ENTERPRISES, LLC, is an Arizona corporation, which, upon
10 information and belief, was conducting business in Arizona as an agent, owner,
11 operator or manager of activities at the motor vehicle raceway facility in Phoenix
12 known as Phoenix Raceway, "PIR", and/or ISM Raceway
- 13 5. The fictitiously named defendants are entities who caused or contributed to plaintiff's
14 injuries; their true names will be added by amendment when ascertained.
- 15 6. The corporate defendants were at all material times acting by and through their
16 employees and/or agents.
- 17 7. On or about March 6, 2020, plaintiff Eric Clifford, a 56 year old Nascar fan was
18 attending an event at defendant PIR in Phoenix which involved interviews in a
19 dedicated outdoor bar area at the raceway which served food and beverages.
- 20 8. Defendants set up the entertainment area with round tables and large umbrellas over the
21 tables.
- 22 9. Eric Clifford was a paying customer seated at one of the tables in the event area on
23 March 6, 2020.
- 24 10. A windstorm had developed and the wind was literally whipping through the area-the
25 wind was loud and so strong as to obviously be a hazard for windblown, unsecured
26 objects.
- 27 11. Defendants Nascar, PIR and ISM knew or should have known that during the strong
28

1 wind storm the large umbrellas over the tables needed to be removed or securely
2 fastened to avoid becoming windborne.

3 12. Defendants Nascar, PIR and Ism inexplicably and negligently failed to remove and/or
4 properly secure the large umbrellas at the event.

5 13. As Mr. Clifford sat on his chair enjoying the Nascar interview one of the unsecured
6 umbrellas was lifted out of its table, became airborne and struck Mr. Clifford in the
7 back of the head as he sat on a high bar stool.

8 14. The force of the large airborne umbrella to the back of Eric's head was violent and
9 knocked him forward off of his chair and onto the ground.

10 15. The airborne umbrella blow to the back of Mr. Clifford's head was witnessed by many
11 of defendant's employees and/or agents and largely captured in video-there is no
12 dispute about the airborne umbrella's striking Mr. Clifford or knocking him off his
13 chair onto the ground.

14 16. Mr. Clifford was treated by paramedics at defendant raceway, loaded into an
15 ambulance and transported to Abrazo West Hospital.

16 17. As a result of the violent umbrella blow and fall to the ground, Eric Clifford suffered
17 multiple, serious and permanent injuries including injuries to his cervical spine,
18 shoulder, wrist, knee, hip and head.

19 18. Emergency room physicians documented and treated Eric's injuries and shortly after
20 the emergency room discharge Eric had a cervical spine MRI film taken which
21 documented:

22 **Indication; Neck pain following umbrella hitting patient at a Nascar race.**

23
24 There is a hypotense signal seen within the C5-6 disc herniation consistent with a more
25 recent/acute herniation of the disc superimposed on chronic degerative.

26 (MRI report of March 13, 2020)

27 In an addendum to the MRI report, the board-certified radiologist confirmed that:

28 **Upon further reviews, there is hypertense signal within the
C5-6, disc herniation. Based on the patient's history as well**

1 as the findings on this MRI and the appearance of this MRI,
 2 it is medically probable that the C5-6 disc herniation is
 3 related to the patient's trauma dated March 6, 2020.

4 19. Eric was referred to orthopedic spine surgeon David M. Prior, M.D. of Honor Health
 5 Orthopedics. Dr. Prior's records also confirm that Eric's disc herniation and cervical
 6 pain problems were caused by the umbrella strike/fall accident. Dr. Prior even
 7 provides, within his operative report the following Indications for Surgery.

8 **INDICATIONS:**

9 The patient sustained an injury when an umbrella struck him in the head and neck.
 10 After the injury he developed severe neck and arm pain. Advanced imaging
 11 demonstrated a disc herniation at C5-6 with severe bilateral foraminal stenosis and
 12 moderate canal stenosis.

(6/22/2020 Operative Report, Dr. David M. Prior, M.D.)

13 20. The surgery, an Anterior Discectomy and Fusion at C5-6 was performed at Honor
 14 Health Scottsdale Osborn Hospital on June 22, 2020. The C5-6 discs were removed,
 15 fused and replaced with an internal cage with screws and plates.

16 21. An MRI of the right shoulder on March 13, 2020 found tears in the supraspinatus
 17 tendon as well as fluid in the joint.

18 22. Eric also suffered a TFCC tear and his orthopedic surgeon Dr. Marc Dinowitz, M.D.
 19 attributed the need for surgery to the fall; That surgery was performed on February 22,
 20 2021 by Dr. Dinowitz at the Arizona Spine and Joint Hospital in Mesa, AZ.

21 23. Treatment for Eric's shoulder and arm problems had to be deferred as the cervical disc
 22 herniation was naturally deemed to be paramount.

23 24. As a result of defendant's negligence and the resulting injuries described herein, Mr.
 24 Clifford has incurred over \$290,000 in medical bills to date; future medical expenses
 25 are presently unknown but will be added by amendment when ascertained.

26 25. It is estimated the future shoulder surgery will be \$35,000-\$50,000 and a life care plan
 27 for all of Mr. Clifford's future accident-related treatments will be \$60,000-\$80,000,
 28

1 bringing total medical specials to \$385,000-\$405,000.

2 26. As a result of the injuries sustained in this easily preventable accident, Mr. Clifford has
3 suffered multiple, disabling orthopedic and spinal injuries, undergone surgery on his
4 cervical spine, wrist and a future shoulder surgery is anticipated.

5 27. As a result of these injuries Mr. Clifford has endured considerable pain, suffering,
6 disability and loss of enjoyment of life and life's activities.

7 28. Pursuant to Arizona Rules of Civil Procedure, Rule 26.2 (c)(3), the Court should assign
8 this case to Tier 3 (Actions claiming \$300,000 or more).

9 **WHEREFORE** Plaintiff prays for judgment against Defendants and each of them as follows:

10 A.) For general damages in a just and reasonable amount;

11 B.) For current medical expenses of \$290,000,

12 C.) For future medical expenses in an amount to be added by amendment or disclosure
13 when ascertained but which are currently estimated at \$75,000-\$100,000.

14 D.) For costs of suit and such other and further relief as the Court deems just.
15

16 DATED this 18th day of April, 2022.

17 **TUCKER & MILLER, L.L.L.P.**

18
19 By: /s/ Daniel P.J. Miller
20 DANIEL P.J. MILLER
Attorneys for Plaintiff

21 **GOLDSTEIN WOODS & ALAGHA**

22 By: /s/ Evan S. Goldstein
23 EVAN S. GOLDSTEIN
Attorneys for Plaintiff
24

25 ORIGINAL of the foregoing e-filed
26 This 18th day of April, 2022,
With the Clerk of the Superior Court.

27 By: /s/ Alexandra Nieminen
28 ESG/PLF/Clifford

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27 **an Arizona corporation;**)
28 **NASCAR ENTERPRISES, LLC, an**)
Arizona corporation;)
JOHN AND JANE DOES I-IV; ABC)
CORPORATIONS and XYZ Partnerships,)

Defendants.

THE STATE OF ARIZONA TO:

The National Association for Stock Car Auto
Racing, LLC, d/b/a "NASCAR," a
Florida corporation

NO. CV2022-002269

SUMMONS

(TIER 3)

If you would like legal advice from a lawyer,
Contact the Lawyer Referral Service at
602-257-4434

or

www.maricopalawyers.org

Sponsored by the
Maricopa County Bar Association

1 YOU ARE HEREBY SUMMONED and required to appear and defend, within the time
 2 applicable, in this action in this Court. If served within Arizona, you shall appear and defend
 3 within 20 days after the service of the Summons and Complaint upon you, exclusive of the day
 4 of service. If served out of the State of Arizona – whether by direct service, by registered or
 5 certified mail, or by publication – you shall appear and defend within 30 days after the service
 6 of the Summons and Complaint upon you is complete, exclusive of the day of service. Where
 7 process is served upon the Arizona Director of Insurance as an insurer's attorney to receive
 8 service of legal process against it in this state, the insurer shall not be required to appear,
 9 answer or plead until expiration of 40 days after date of such service upon the Director.
 Service by registered or certified mail without the State of Arizona is complete 30 days after
 receipt. Service by publication is complete 30 days after the date of first publication. Direct
 service is complete when made. Service upon the Arizona Motor Vehicle Superintendent is
 complete 30 days after filing the Affidavit of Compliance and return receipt or Officer's
 Return. Ariz.R.Civ.P. 4; A.R.S. Ann. §§ 20-222, 28-502, 28-503.

10 YOU ARE HEREBY NOTIFIED that in case of your failure to appear and defend
 11 within the time applicable, judgment by default may be rendered against you for the relief
 demanded in the Complaint.

12 YOU ARE CAUTIONED that in order to appear and defend, you must file an Answer
 13 or proper response in writing with the Clerk of this Court, accompanied by the necessary filing
 14 fee, within the time required, and you are required to serve a copy of any Answer or response
 upon the Plaintiff's attorney. Ariz.R.Civ.P. 10(d); A.R.S. Ann. § 12-311; RCP 5.

15 Requests for reasonable accommodation for persons with disabilities must be made to
 16 the division assigned to the case by parties at least 3 judicial days in advance of a scheduled
 17 court proceeding. Local Rule 2.5.

18 Requests for an interpreter for persons with limited English proficiency must be made
 19 to the office of the Judge or Commissioner assigned to the case by the parties at least ten (10)
 judicial days in advance of a scheduled court proceeding.

20 The name and address of plaintiff's attorney are noted above.

21
 22 SIGNED AND SEALED this date: _____

APR 18 2022

23
 24 JEFF FINE, Clerk

25 JEFF FINE, CLERK

26 By _____

Deputy Clerk



27 L. McCarty

ORIGINAL

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ERIC CLIFFORD, a single man.

Plaintiff,

v.

**The National Association for Stock Car
Auto Racing, LLC. d/b/a "NASCAR", a
Florida Corporation; Phoenix
Speedway, LLC d/b/a Phoenix Raceway
and "PIR" and formerly ISM Raceway,
an Arizona corporation;
NASCAR ENTERPRISES, LLC, an
Arizona corporation;
JOHN AND JANE DOES I-IV; ABC
CORPORATIONS and XYZ Partnerships,**

Defendants.

) NO. CV2022-002269

) **SUMMONS**

) **(TIER 3)**

) If you would like legal advice from a lawyer,
) Contact the Lawyer Referral Service at
) 602-257-4434
) or
) www.maricopalawyers.org
) Sponsored by the
) Maricopa County Bar Association

THE STATE OF ARIZONA TO: Phoenix Speedway, LLC, d/b/a Phoenix Raceway
and "PIR" and formerly ISM Raceway, an
Arizona corporation

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 2 applicable, in this action in this Court. If served within Arizona, you shall appear and defend
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 4 of service. If served out of the State of Arizona – whether by direct service, by registered or
 5 certified mail, or by publication – you shall appear and defend within 30 days after the service
 6 of the Summons and Complaint upon you is complete, exclusive of the day of service. Where
 7 process is served upon the Arizona Director of Insurance as an insurer's attorney to receive
 8 service of legal process against it in this state, the insurer shall not be required to appear,
 9 answer or plead until expiration of 40 days after date of such service upon the Director.
 10 Service by registered or certified mail without the State of Arizona is complete 30 days after
 11 receipt. Service by publication is complete 30 days after the date of first publication. Direct
 12 service is complete when made. Service upon the Arizona Motor Vehicle Superintendent is
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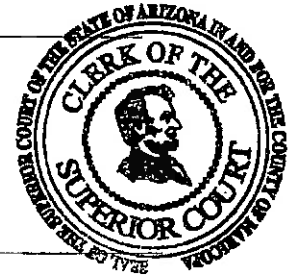
21
 22 SIGNED AND SEALED this date: APR 18 2022

23
 24 JEFF FINE, Clerk

25 JEFF FINE, CLERK

26 By

27 Deputy Clerk



28 L. McCarty

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31 **CORPORATIONS and XYZ Partnerships,**)

32 Defendants.

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41 Sponsored by the
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43 THE STATE OF ARIZONA TO: NASCAR Enterprises, LLC, an Arizona
44 corporation

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SIGNED AND SEALED this date: APR 18 2022

JEFF FINE, Clerk
 JEFF FINE, CLERK

By 
 Deputy Clerk

L. McCarty



EXHIBIT B

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Defendants.)	

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COUNT ONE
NEGLIGENCE

- 1 1. Plaintiff is a resident of Yuma County Arizona and the events complained of
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- 3 2. Defendant Nascar, Inc. is a Florida corporation doing business in Arizona by,
4 among other activities owning and/or operating a motor vehicle raceway
5 facility in west Phoenix known as Phoenix International Raceway and/or ISM
6 Raceway, Inc.
- 7 3. Defendants Phoenix International Raceway (hereinafter "PIR" and ISM, Inc.
8 are corporations or legal entities doing business in Maricopa County by, among
9 other things owning, operating and/or managing a motor vehicle raceway in
10 West Phoenix.
- 11 4. The fictitiously named defendants are entities who caused or contributed to
12 plaintiff's injuries; their true names will be added by amendment when
13 ascertained.
- 14 5. The corporate defendants were at all material times acting by and through their
15 employees and/or agents.
- 16 6. On or about March 6, 2020, plaintiff Eric Clifford, a 56 year old Nascar fan
17 was attending an event at defendant PIR in Phoenix which involved interviews
18 in a dedicated outdoor bar area at the raceway which served food and
19 beverages.
- 20 7. Defendants set up the entertainment area with round tables and large umbrellas
21 over the tables.
- 22 8. Eric Clifford was a paying customer seated at one of the tables in the event
23 area on March 6, 2020.
- 24
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1 9. A windstorm had developed and the wind was literally whipping through the
2 area-the wind was loud and so strong as to obviously be a hazard for
3 windblown, unsecured objects.
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5 10. Defendants Nascar, PIR and ISM knew or should have known that during the
6 strong wind storm the large umbrellas over the tables needed to be removed or
7 securely fastened to avoid becoming windborne.
8

9 11. Defendants Nascar, PIR and Ism inexplicably and negligently failed to remove
10 and/or properly secure the large umbrellas at the event.
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12 12. As Mr. Clifford sat on his chair enjoying the Nascar interview one of the
13 unsecured umbrellas was lifted out of its table, became airborne and struck Mr.
14 Clifford in the back of the head as he sat on a high bar stool.
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16 13. The force of the large airborne umbrella to the back of Eric's head was violent
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24 15. Mr. Clifford was treated by paramedics at defendant raceway, loaded into an
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27 16. As a result of the violent umbrella blow and fall to the ground, Eric Clifford
28 suffered multiple, serious and permanent injuries including injuries to his
cervical spine, shoulder, wrist, knee, hip and head.

1 17. Emergency room physicians documented and treated Eric's injuries and shortly
2 after the emergency room discharge Eric had a cervical spine MRI film taken
3 which documented:
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5 **Indication; Neck pain following umbrella hitting patient at a Nascar race.**

6 There is a hypotense signal seen within the C5-6 disc herniation consistent with
7 a more recent/acute herniation of the disc superimposed on chronic degenerative.
8 (MRI report of March 13, 2020)
9

10 In an addendum to the MRI report, the board certified radiologist confirmed that:
11 **Upon further reviews, there is hypertense signal within**
12 **the C5-6, disc herniation. Based on the patient's history**
13 **as well as the findings on this MRI and the appearance**
14 **of this MRI, it is medically probable that the C5-6 disc**
herniation is related to the patient's trauma dated
March 6, 2020.

15 18. Eric was referred to orthopedic spine surgeon David M. Prior, M.D. of Honor
16 Health Orthopedics. Dr. Prior's records also confirm that Eric's disc
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23 **neck. After the injury he developed severe neck and arm pain. Advanced**
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4 M.D. attributed the need for surgery to the fall; That surgery was performed
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7

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9 cervical disc herniation was naturally deemed to be paramount.
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20 25. As a result of the injuries sustained in this easily preventable accident, Mr.
21 Clifford has suffered multiple, disabling orthopedic and spinal injuries,
22 undergone surgery on his cervical spine, wrist and a future shoulder surgery is
23 anticipated.
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28

1 27. Pursuant to Arizona Rules of Civil Procedure, Rule 26.2 (c)(3), the Court
2 should assign this case to Tier 3 (Actions claiming \$300,000 or more).

3 **WHEREFORE** Plaintiff prays for judgment against Defendants and each of them as
4 follows:
5

6 A.) For general damages in a just and reasonable amount;

7 B.) For current medical expenses of \$290,000,

8 C.) For future medical expenses in an amount to be added by amendment or
9 disclosure when ascertained but which are currently estimated at \$75,000-
10 \$100,000.
11

12 D.) For costs of suit and such other and further relief as the Court deems just.

13 DATED this 23rd day of February 2022.

14 **TUCKER & MILLER, L.L.L.P.**

15
16
17 By: /s/ Daniel P.J. Miller
18 DANIEL P.J. MILLER
19 Attorneys for Plaintiff
20
21
22
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24
25
26
27
28

Clerk of the Superior Court
*** Electronically Filed ***
K. Higuchi-Mason, Deputy
2/23/2022 2:10:07 PM
Filing ID 13971850

Person/Attorney Filing: Daniel Miller
Mailing Address: 1440 E Missouri Ave Ste C150
City, State, Zip Code: Phoenix, AZ 85014
Phone Number: (602)870-5511
E-Mail Address: dmiller@tucker-miller.com
[] Representing Self, Without an Attorney
(If Attorney) State Bar Number: 009769, Issuing State: AZ

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

Eric F CLIFFORD

Plaintiff(s),

Case No. CV2022-002269

v.

The National Assoc of Stock Car
Auto Racin, AKA NASCAR, et al.
Defendant(s).

SUMMONS

To: The National Assoc of Stock Car Auto Racin, AKA NASCAR

WARNING: THIS AN OFFICIAL DOCUMENT FROM THE COURT THAT AFFECTS YOUR RIGHTS. READ THIS SUMMONS CAREFULLY. IF YOU DO NOT UNDERSTAND IT, CONTACT AN ATTORNEY FOR LEGAL ADVICE.

1. A lawsuit has been filed against you. A copy of the lawsuit and other court papers were served on you with this Summons.
2. If you do not want a judgment taken against you without your input, you must file an Answer in writing with the Court, and you must pay the required filing fee. To file your Answer, take or send the papers to Clerk of the Superior Court, 201 W. Jefferson, Phoenix, Arizona 85003 or electronically file your Answer through one of Arizona's approved electronic filing systems at <http://www.azcourts.gov/efilinginformation>. Mail a copy of the Answer to the other party, the Plaintiff, at the address listed on the top of this Summons.
Note: If you do not file electronically you will not have electronic access to the documents in this case.
3. If this Summons and the other court papers were served on you within the State of Arizona, your Answer must be filed within TWENTY (20) CALENDAR DAYS from the date of service, not counting the day of service. If this Summons and the other court papers were served on you outside the State of Arizona, your Answer must be filed within THIRTY (30) CALENDAR DAYS from the date of service, not counting the day of service.

Requests for reasonable accommodation for persons with disabilities must be made to the court by parties at least 3 working days in advance of a scheduled court proceeding.

GIVEN under my hand and the Seal of the Superior Court of the State of Arizona in and for the County of MARICOPA

SIGNED AND SEALED this Date: *February 23, 2022*

JEFF FINE
Clerk of Superior Court

By: *KYOKO HIGUCHI*
Deputy Clerk



Requests for an interpreter for persons with limited English proficiency must be made to the division assigned to the case by the party needing the interpreter and/or translator or his/her counsel at least ten (10) judicial days in advance of a scheduled court proceeding.

If you would like legal advice from a lawyer, contact Lawyer Referral Service at 602-257-4434 or <https://maricopabar.org>. Sponsored by the Maricopa County Bar Association.

Clerk of the Superior Court
*** Electronically Filed ***
K. Higuchi-Mason, Deputy
2/23/2022 2:10:07 PM
Filing ID 13971851

Person/Attorney Filing: Daniel Miller
Mailing Address: 1440 E Missouri Ave Ste C150
City, State, Zip Code: Phoenix, AZ 85014
Phone Number: (602)870-5511
E-Mail Address: dmiller@tucker-miller.com
[] Representing Self, Without an Attorney
(If Attorney) State Bar Number: 009769, Issuing State: AZ

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

Eric F CLIFFORD

Plaintiff(s),

Case No. CV2022-002269

v.

The National Assoc of Stock Car
Auto Racin, AKA NASCAR, et al.
Defendant(s).

SUMMONS

To: Phx International Raceway PIR, AKA PIR

WARNING: THIS AN OFFICIAL DOCUMENT FROM THE COURT THAT AFFECTS YOUR RIGHTS. READ THIS SUMMONS CAREFULLY. IF YOU DO NOT UNDERSTAND IT, CONTACT AN ATTORNEY FOR LEGAL ADVICE.

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SIGNED AND SEALED this Date: *February 23, 2022*

JEFF FINE
Clerk of Superior Court

By: *KYOKO HIGUCHI*
Deputy Clerk



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Clerk of the Superior Court
*** Electronically Filed ***
K. Higuchi-Mason, Deputy
2/23/2022 2:10:07 PM
Filing ID 13971853

Person/Attorney Filing: Daniel Miller
Mailing Address: 1440 E Missouri Ave Ste C150
City, State, Zip Code: Phoenix, AZ 85014
Phone Number: (602)870-5511
E-Mail Address: dmiller@tucker-miller.com
[] Representing Self, Without an Attorney
(If Attorney) State Bar Number: 009769, Issuing State: AZ

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

Eric F CLIFFORD

Plaintiff(s),

Case No. CV2022-002269

v.

The National Assoc of Stock Car
Auto Racin, AKA NASCAR, et al.
Defendant(s).

SUMMONS

To: Phoenix International Raceway

WARNING: THIS AN OFFICIAL DOCUMENT FROM THE COURT THAT AFFECTS YOUR RIGHTS. READ THIS SUMMONS CAREFULLY. IF YOU DO NOT UNDERSTAND IT, CONTACT AN ATTORNEY FOR LEGAL ADVICE.

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2. If you do not want a judgment taken against you without your input, you must file an Answer in writing with the Court, and you must pay the required filing fee. To file your Answer, take or send the papers to Clerk of the Superior Court, 201 W. Jefferson, Phoenix, Arizona 85003 or electronically file your Answer through one of Arizona's approved electronic filing systems at <http://www.azcourts.gov/efilinginformation>. Mail a copy of the Answer to the other party, the Plaintiff, at the address listed on the top of this Summons.
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GIVEN under my hand and the Seal of the Superior Court of the State of Arizona in and for the County of MARICOPA

SIGNED AND SEALED this Date: *February 23, 2022*

JEFF FINE
Clerk of Superior Court

By: *KYOKO HIGUCHI*
Deputy Clerk



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EXHIBIT C



Notice of Service of Process

Transmittal Number: 24838165
Date Processed: 04/28/2022

Primary Contact: Ms. Suzanne Thompson
NASCAR
International Motorsports Center
One Daytona Boulevard
Daytona Beach, FL 32114-1243

Electronic copy provided to: Random Burnett Esq.

Entity:	Nascar Enterprises, LLC Entity ID Number 4002319
Entity Served:	NASCAR Enterprises, LLC
Title of Action:	Eric Clifford vs. The National Association for Stock Car Auto Racing, LLC d/b/a "Nascar"
Document(s) Type:	Summons and Amended Complaint
Nature of Action:	Personal Injury
Court/Agency:	Maricopa County Superior Court, AZ
Case/Reference No:	CV2022-002269
Jurisdiction Served:	Arizona
Date Served on CSC:	04/25/2022
Answer or Appearance Due:	20 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	Tucker & Miller, L.L.P. 602-870-5511

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC
251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com



Notice of Service of Process

null / ALL
Transmittal Number: 24838208
Date Processed: 04/28/2022

Primary Contact: Ms. Suzanne Thompson
NASCAR
International Motorsports Center
One Daytona Boulevard
Daytona Beach, FL 32114-1243

Electronic copy provided to: Random Burnett Esq.

Entity:	Phoenix Speedway, LLC Entity ID Number 1988014
Entity Served:	Phoenix Speedway, LLC, d/b/a Phoenix Raceway
Title of Action:	Eric Clifford vs. The National Association for Stock Car Auto Racing, LLC. d/b/a "Nascar",
Document(s) Type:	Summons and Amended Complaint
Nature of Action:	Personal Injury
Court/Agency:	Maricopa County Superior Court, AZ
Case/Reference No:	CV2022-002269
Jurisdiction Served:	Arizona
Date Served on CSC:	04/25/2022
Answer or Appearance Due:	20 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	Tucker & Miller, L.L.L.P. 602-870-5511

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC
251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

DL Investigations & Attorney Support LLC
 7501 N. 16th Street, Suite 200
 Phoenix, AZ 85020
 (602) 285-9901



COPY
 APR 29 2022
 CLERK OF THE SUPERIOR COURT
 M. MENDEZ
 DEPUTY CLERK

Inv. #

146443

**SUPERIOR COURT OF THE STATE OF ARIZONA
 IN AND FOR THE COUNTY OF MARICOPA**

ERIC CLIFFORD

Plaintiff / Petitioner,

vs.

**THE NATIONAL ASSOCIATION FOR STOCK CAR AUTO
 RACING, L.L.C. dba "NASCAR"; et al.**

Defendant / Respondent.

NO. CV2022-0022269

CERTIFICATE OF SERVICE

OUT OF TOWN SERVICE, the undersigned certifies under penalty of perjury: That I am fully qualified pursuant to RCP 4 (d), 4 (e), 45 (b) and/or ARS 13-4072, to serve process in this case, and received for service the following documents in this action:

SUMMONS, FIRST AMENDED COMPLAINT

from **Evan S. Goldstein c/o Goldstein, Woods & Alagha, P.C.** on **4/25/22** :
 that I personally served copies of these documents on those named below in the manner and time and place shown; and except where noted, all services were made in Maricopa County, Arizona.

NAME: **THE NATIONAL ASSOCIATION FOR STOCK CAR AUTO RACING, L.L.C. dba "NASCAR", c/o W. Garrett Crotty, Statutory Agent**

DATE & TIME: 4/27/22 10:59am

PLACE & 1 DAYTONA BLVD. DAYTONA BEACH, FL 32114, which is his/her place of business.

MANNER: By serving GARY CROTTY, a person authorized to accept such service on their behalf, in person.

Statement of Costs

Services	\$75.00	
Mileage		
Sp. Handl.	\$70.00	
Witness		
Advances		
Cert. Prep	\$25.00	S/C
Other	\$7.50	
Total	\$177.50	

The above is covered by A.R.S. as amended 41-314 & 11-45 and Rules 4, 5 and 45.

AFFIDAVIT OF SERVICE

Case: CV2022-0022269	Court: SUPERIOR COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF MARICOPA	County: MARICOPA	Job: 7006215 (2478)
Plaintiff / Petitioner: ERIC CLIFFORD , a single man		Defendant / Respondent: THE NATIONAL ASSOCIATION FOR STOCK CAR AUTO RACING d/b/a 'NASCAR' a Florida Corporation , et el	
Received by: All Florida Investigations & Forensic Services Inc. (AFI)		For: DL Investigations & Attorney Support, LLC	
To be served upon: GARY CROTTY , STAT AGENT			

I, John Gaspar, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: GARY CROTTY , STAT AGENT , THE NATIONAL ASSOCIATION FOR STOCK CAR AUTO RACING LLC , d/b/a 'NASCAR' , c/o W. Garret Crotty, Stat Agent : 1 Daytona Blvd, Daytona Beach, FL 32114

Manner of Service: Authorized, Apr 27, 2022, 10:59 am EDT

Documents: SUMMONS, FIRST AMENDED COMPLAINT (Received Apr 26, 2022 at 4:00pm EDT)

Additional Comments:

1) Successful Attempt: Apr 27, 2022, 10:59 am EDT at THE NATIONAL ASSOCIATION FOR STOCK CAR AUTO RACING LLC , d/b/a 'NASCAR' , c/o W. Garret Crotty, Stat Agent : 1 Daytona Blvd, Daytona Beach, FL 32114 received by GARY CROTTY , STAT AGENT . Age: 48; Ethnicity: Caucasian; Gender: Female; Weight: 180; Height: 4'4"; Relationship: Paralegal; Arrived at the recipients address and served the legal papers to an authorized agent Paralegal Dawn Gilmore .

John Gaspar
A 2800136 C 8700342

4/27/22

Date

DL Investigations
7501 N. 16th Street #200
Phoenix, AZ 85020
602-285-9901